

Shasta County Air Quality Management District

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Evaluation Report

**Regarding Proposed Issuance of a
Title V Operating Permit to
Burney Forest Products**

for Equipment Located at:

**35586-B Highway 299E
Burney, CA**

3/31/98

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Title V Operating Permit**

Introduction

The district proposes to issue a Title V operating permit to Burney Forest Products. This evaluation with the proposed Title V operating permit sets forth the legal and factual basis for the conditions contained in the proposed permit.

Facility Description

Burney Forest Products is a 31 MW (net) biomass "Qualifying Facility" providing 15,000 lb/hr process steam to an adjacent sawmill. Burney Forest Products is considered a federal Major Source and subject to the Title V permitting program due to the facility's potential to emit emissions of oxides of nitrogen (NO_x), Particulate Matter less than 10 microns (PM₁₀), Carbon Monoxide (CO), and Volatile Organic Compounds (VOC).

Equipment Description

The major equipment located at the Burney facility include:

- 2 - Riley Stoker Corp. Stationary Grate Stoker Wood-Fired Boilers (Boilers #1 and #2) Serial Nos. 23767-89 and 23768-89. Each also equipped with a 90 MMBTU/Hr Coen Natural Gas Fired Model 250 Burners
- 2 - Ash Reinjection Systems from Multicone and Air Heater
- 2 - Three-Field Electrostatic Precipitators
- 2 - Ammonia Injection Systems

As approved by the U.S. Environmental Protection Agency (U.S. EPA), all equipment exempted from permit, per Shasta County Air Quality Management District Rule 2.5, are each considered an insignificant activity. These include the following:

- 1 - Safety Clean Degreaser Model No. 30R (26 Gallon Capacity)
- 1 - Safety Clean Degreaser Model No. 17R (15 Gallon Capacity)
- 1 - 1000 Gallon Diesel Storage Tank
- 1 - 2000 Gallon Diesel Storage Tank
- 1 - 500 Gallon Gasoline/1500 Gallon Diesel Storage Tank
- 1 - 3-Cell Cooling Tower
- 1 - 500 KW Portable Generator

Applicable Federal Requirements:

Based upon information submitted in the application and the district's review, the following applicable federal requirements apply to this facility:

SIP Requirements:**Rule 1:2, Definitions**

This rule lists the definitions used throughout the District rule book. This rule is an administrative rule, and Burney Forest Products certified compliance in the application. However, the District feels that the environmental benefits are not such that this rule should be included in the proposed Title V permit.

Rule 2.1A, Permits Required

These are the District's requirements for preconstruction permits and permits to operate. This rule is an administrative rule, and Burney Forest Products certified compliance in the application. However, the District feels that the environmental benefits are not such that this rule should be included in the proposed Title V permit.

Rule 2:5, Exemptions

This rule lists the types of devices or operations that the APCO may exempt. This rule is an administrative rule, and Burney Forest Products certified compliance in the application. However, the District feels that the environmental benefits are not such that this rule should be included in the proposed Title V permit.

Rule 2:6, Open Burning (2:6.a.4(c) & 2:6.b)

This rule lists the regulations required to conduct open burning operations. Burney Forest Products certified compliance with this requirement in the application. However, Burney Forest Products does not conduct open burning operations at this facility and the District feels that the environmental benefits are not such that this rule should be included in the proposed Title V permit.

Rule 2:7, Conditions for Open Burning

This rule lists the regulations required to conduct open burning operations. Burney Forest Products certified compliance with this requirement in the application. However, Burney Forest Products does not conduct open burning operations at this facility and the District feels that the environmental benefits are not such that this rule should be included in the proposed Title V permit.

Rule 2:10, Action on Applications

This rule requires that an application for an Authority to Construct be filed in a manner and on the form prescribed by the APCO. This rule is an administrative rule, and Burney Forest Products certified compliance in the application. However, the District feels that the environmental benefits are not such that this rule should be included in the proposed Title V permit.

Rule 2:11, Fees

This rule requires that renewal fees be paid in accordance with the fee schedule contained in the rule. The District has revised this rule and the fee schedule has also changed. In addition, Rule V mandates that a presumptive fee schedule be used in conjunction with the current fees collected by the District. Therefore, this rule was not included in the proposed Title V permit.

Rule 2:12, Expiration of Applications

This rule requires that an Authority to Construct application will expire after the Permit to Operate has been issued or two years after the Authority to Construct was issued unless construction has commenced on the site. It also states that a Permit to Operate application will expire two years after being issued. This rule is an administrative rule, and Burney Forest Products certified compliance in the application. However, the District feels that the environmental benefits are not such that this rule should be included in the proposed Title V permit.

Rule 2:14, Testing Facilities

This rule requires the operator to provide and maintain testing and sampling facilities as specified in the Authority to Construct or Permit to Operate. This requirement is included in the proposed Title V permit.

Rule 2:17, Status of permit (formerly Rule 2:20)

This rule requires the permittee to notify the District in writing of any significant change in any item of information submitted to the District. This requirement is included in the proposed Title V permit.

Rule 2:18, Applications Deemed Denied

This rule requires that unless information is submitted in order to deem an application complete within 30 days, the application is denied. This rule is an administrative rule, and Burney Forest Products certified compliance in the application. However, the District feels that the environmental benefits are not such that this rule should be included in the proposed Title V permit.

Rule 2:21, Defacing Permit (formerly Rule 2:24)

This rule requires that a permit not be defaced. This requirement is included in the proposed Title V permit.

Rule 2:23, Posting of Permit

This rule requires that the permit be posted. This requirement is included in the proposed Title V permit.

Rule 2:25, Public Records

This rule lists the requirements for what may or may not be public records and includes labeling requirements. This requirement is included in the proposed Title V permit.

Rule 2:26, Revocation of Permit

This rule lists the requirements for revoking a permit. This requirement is included in the proposed Title V permit.

Rule 2:27, Submittal of Information

This rule is an administrative rule, and Burney Forest Products certified compliance in the application. However, the District feels that the environmental benefits are not such that this rule should be included in the proposed Title V permit.

Rule 3:1, Applicability of State Laws

This rule adopts by reference all state and federal rules for air contaminants. This requirement is included in the proposed Title V permit.

Rule 3.2, Specific Air Contaminants

This rule specifies limits for emissions of:

- 1) Combustion particulate matter in gr/dscf;
- 2) Particulate matter less than or equal to 10 microns in gr/dscf;
- 3) All other particulate matter in gr/dscf
- 4) Particulate matter process weight: maximum hourly emissions as a function of process weight in tons per hour;
- 5) Oxides of Sulfur (as SO₂) in ppm;
- 6) Oxides of Nitrogen (as NO₂) in ppm; and
- 7) Opacity.

This requirement is included in the proposed Title V permit.

Rule 3:4, Industrial use of Organic Solvents

This rule requires that a control device achieving 85 percent control be utilized unless listed lb/day limits are complied to. This requirement is included in the proposed Title V permit.

Rule 3:6, Circumvention

This rule requires that emissions cannot be concealed by circumvention. This requirement is included in the proposed Title V permit.

Rule 3:7, Enforcement

This rule requires that the rules and regulations be enforced by the APCO. This requirement does not pertain to Burney Forest Products. Therefore, this requirement was not included in the Title V permit.

Rule 3:9, Recommendations of Control Officer

This rule states that no recommendation of the APCO is a guaranty that the recommended device or process will result in compliance. This rule is an administrative rule, and Burney Forest Products certified compliance in the application. However, the District feels that the environmental benefits are not such that this rule should be included in the proposed Title V permit.

Rule 3:10, Excess Emissions

This rule requires certain reporting and corrective action in the case of emissions that exceed permit requirements. These requirements are included in the proposed Title V permit.

Rule 3:11, Local Rules

This rule states that any city or public agency, having authority to do so, may enact by ordinance more restrictive than contained in the District's rule book. Because this permit is a federal permit and does not concern local rules, the District feels that the environmental benefits are not such that this rule should be included in the proposed Title V permit.

Rule 3:17, Organic Solvent Degreasing Operations

This rule requires degreasing operations to meet design and operating practices specifications. This rule was repealed by the District when the District adopted a revised organic solvent operations rule. The new rule has not been submitted for inclusion into the SIP. Because the District has repealed this rule, the equipment that would be regulated is listed as insignificant and is regulated by District Rule 3:4 (included as a permit condition) the District feels that the environmental benefits are not such that this rule should be included in the proposed Title V permit.

Rule 5, Additional procedures for issuing permits to operate for sources subject to Title V of the Federal Clean Air Act Amendments of 1990.

This rule lists the requirements of the Title V program. All requirements imposed by this rule are included in the proposed Title V permit.

40 CFR 82.161

This regulation requires that equipment utilizing ozone depleting substances be maintained by certified technicians. These requirements are included in the proposed Title V permit.

New Source Performance Standards (NSPS)

This facility is subject to 40 CFR Part 60 - Standards Of Performance For New Stationary Sources and Subpart Db, "Standards of Performance for Industrial-Commercial-Institutional Steam Generators." The requirements of these standards are included or subsumed by more stringent conditions in the proposed Title V permit.

Prevention of Significant Deterioration (PSD) Permitting

This regulation sets the procedures for the review of new or modifications of existing major stationary emission sources. Since the subject emission source was issued a PSD permit as the Authority to Construct for the facility, the conditions of the Authority to Construct are included in the proposed Title V permit.

Risk Management Plans Preparation and Registration, 112 (r)

Section 112(r), Accidental Release Prevention and Management Program, affects facilities at which certain substances are present above the specified annual threshold. Burney Forest Products will need to submit a 112(r) Risk Management Plan.

REQUIREMENTS THAT DO NOT APPLY:

Rule 2:4, Permit to Sell or Rent

This rule pertains to the use of incinerators. There are no incinerators at this facility. Therefore, this requirements is not applicable to this facility.

Rule 2:8, Agricultural Burning

This rule applies only to agricultural burning operations. This facility does not conduct agricultural operations. Therefore, this requirement is not applicable to this facility.

Rule 3:3, Gasoline Storage

This rule requires all storage tanks storing gasoline, with capacity of 250 gallons or more, to be equipped with one of the following: permanent submerged fill pipe, a vapor recovery system, or a floating roof. Burney Forest Products Burney does not have a gasoline storage tank. Therefore, this requirement is not included in the proposed Title V permit.

Rule 3:5, Agricultural Uses

This rule exempts discharges in the course of applying agricultural materials. This facility does not apply agricultural materials. Therefore, this requirement is not included in the proposed Title V permit.

Rule 3:12, Reduction of Matter of Animal Origin (Except Curing of Glue)

This rule mandates controls for reducing animal matter. Burney Forest Products does not reduce animal matter as part of the process. Therefore, this requirement is not included in the proposed Title V permit.

Rule 3:14, Petroleum Dry Cleaners

This rule mandates control and operating practices for dry_cleaning operations. Burney Forest Products does not operate a dry cleaning machine at this facility. Therefore, this requirement is not included in the proposed Title V permit.

Rule 3:15, Cutback Asphalt

This rule requires certain cutback asphalt not to be used. Burney Forest Products does not apply cutback asphalt at this facility. The District feels that the environmental benefits are not such that this rule should be included in the proposed Title V permit.

MACT Standards for Halogenated Solvent Cleaning Operations

This regulation requires degreasers using certain halogenated solvents to meet certain requirements. Because the degreaser does not use solvents regulated by the standard, the MACT standard is not an applicable requirement for the Burney facility. The permit is conditioned so that the permittee notify the District prior to changing the type of solvent used at the facility.

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